

1 DAVID A. HUBBERT
Deputy Assistant Attorney General

2 BORIS KUKSO
3 Trial Attorney, Tax Division
U.S. Department of Justice
4 P.O. Box 683
Washington, D.C. 20044
5 202-353-1857 (v)
202-307-0054 (f)
6 Boris.Kukso@usdoj.gov

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 EDWARD T. KENNEDY,

13 Defendant.

)
) Case No. 2:21-cv-1964-WBS-CKD
)
) **DECLARATION OF IRS REVENUE**
) **OFFICER BRUCE KREUTZER**
)

14 I, BRUCE KREUTZER pursuant to 28 U.S.C. § 1746, hereby declare that:

- 15
- 16 1. I am the duly appointed IRS Revenue Officer, with a post of duty in Pittsburgh, PA. I have
17 personal knowledge of the representations made herein.
- 18 2. As part of my official duties, I was assigned to collect Edward Kennedy's outstanding tax
19 liabilities. On or about May 3, 2021, a Notice of Federal Tax Lien (NFTL) naming Mr.
20 Kennedy as a delinquent taxpayer was filed at the Schuylkill County Prothonotary, in
21 Pottsville, Pennsylvania,
- 22 3. On or about June 3, 2021, via regular mail, I received at my home address a letter from Mr.
23 Kennedy threatening that a commercial lien would be filed against me.
- 24 4. I am not personally acquainted with Mr. Kennedy and have not had any contact or
25 relationship with him other than in my official capacity as the Revenue Officer. I have not

1 engaged in any contract, security agreement, or personal transaction with Mr. Kennedy and
2 do not owe money to him. There is no legitimate reason for Mr. Kennedy to impose a lien on
3 my personal property.

4 5. The threats of possible lien filings against me have caused me to experience distress and
5 anxiety. For example, I am concerned that such lien filings may have a negative impact on
6 my credit record and my ability to obtain credit.

7 6. I declare under penalty of perjury that the foregoing is true and correct.

8
9 Dated: March 28, 2022

10
11 

12 BRUCE KREUTZER
13 IRS Revenue Officer
14
15
16
17
18
19
20
21
22
23
24
25